

United States Bankruptcy Court  
Eastern District of Virginia  
Alexandria Division

In re:

**M.D.M. Property, LLC,**

Debtor.

Case No. 14-13987-RGM

Chapter 11

**Hearing March 10, 2015, at 11:00 am**

**Objection to Employment of Gunselman Realty**

The Office of the U.S. Trustee has filed papers with the court to convert this case to chapter 7 or to dismiss this case because the debtor has not filed any monthly reports or paid the United States Trustee fee.

The debtor has not cured these deficiencies. Accordingly, the court should not approve the employment of any professional until the debtor has addressed these deficiencies.

Further, in the Commercial Listing Agreement filed with the application, docket no. 39, page 28, in ¶ 14, there is a Waiver of Conflict provision that states the agent may represent any prospective purchaser and that the debtor waives any conflict of interest claim. This provision is contrary to the Bankruptcy Code's requirement of having disinterested professionals assist in the administration of the estate.

March 6, 2015:

Judy A. Robbins  
United States Trustee

/s/ Jack I. Frankel  
Jack I. Frankel, Attorney  
Office of United States Trustee  
115 South Union Street, Suite 210  
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